

### **REMARKS**

Claim 22 has been canceled. Claims 1-21 remain pending in the application. Applicant amends claims 1, 8, and 15 for clarification, and refers to Figs. 15-16 and 21-23, and their corresponding description in the specification for exemplary embodiments of and support for the claimed invention. Applicant amends claim 13 for a minor correction. No new matter has been added.

Applicant, again, acknowledges with appreciation the Examiner's allowance of claims 9-14 and the finding that claims 4-5, 7, 18-19, and 21 contain allowable subject matter. Applicant respectfully submits that base claims 1 and 15 are patentable over the reference cited against them as demonstrated below. Accordingly, Applicant requests that the Examiner also allow claims 4-5, 7, 18-19, and 21 dependent from claims 1 and 15, respectively.

Claims 1, 3, 6, 8, 15, 17, and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,079,020 to Liu ; and claims 2 and 16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Liu in view of Li. Applicant amends claims 1, 8, and 15 in a good faith effort to clarify the invention as distinguished from the cited references, and respectfully traverses the rejections.

Applicant refers to Figs. 15-16 and 21-23 of the application for exemplary embodiments of the claimed invention where each of domains #1-#4 has network addresses (destination) and masks covering at least two routers connected by a virtual private network. And the at least two routers (packet relaying apparatus) may commonly use network addresses and masks, thus providing for a network that includes a domain covering at least two routers connected by a VPN.

Liu describes on col. 10, lines 14-15 and 34-36, in states 804 and 904,

“the system manager issues commands to create and define groups of network nodes...the system gets a list of groups involved in the command, in other words the groups to be included in the VPN.”

Liu only describes—with reference to col. 4, lines 50-53 and col. 9, lines 44-46 thereof—one group corresponding to one VPN gateway. In other words, one group only has one pair of network address and mask corresponding to a VPN gateway. And the cited portions of Liu do not include any disclosure or suggestion that a group covers at least two routers.

Thus, Liu, as cited and relied upon by the Examiner, fails to disclose or suggest,

“[a] packet relaying apparatus comprising:

first means for selecting one or more transmission destination virtual private network identifiers which are allowed to relay a received packet based on a transmission source virtual private network identifier related to the received packet;

second means for selecting one or more transmission destination domain identifiers corresponding to each of said one or more transmission destination virtual private network identifiers, the one or more transmission destination domain identifiers corresponding to a plurality of destination addresses and masks, at least one of the destination domain identifiers corresponding to a plurality of destination addresses and masks that are *commonly used for the packet relaying apparatus and another packet relaying apparatus* that are connected by a virtual private network;

third means for collating, using a mask, a next relaying apparatus address of the received packet with each routing information stored in one or more domain relaying means which corresponds to each of the one or more domain identifiers to select the next packet relaying apparatus address; and

fourth means for transmitting the received packet in accordance with the next relaying apparatus address selected by the third means,” as recited in claim 9. (Emphasis added)

Accordingly, Applicant respectfully submits that claim 1, together with claims 3 and 6 dependent therefrom, is patentable over Liu for at least the foregoing reasons. Claims 8 and 15 incorporate features that correspond to those of claim 1 cited above, and are, therefore,

together with claims 17 and 20 dependent from claim 15, patentable over Liu for at least the same reasons. The Examiner relied upon Li to specifically address additional features recited in claims 2 and 16. As such, even assuming, arguendo, that it would have been obvious to one skilled in the art to combine this reference at the time the claimed invention was made, such a combination would still have failed to cure the above-described deficiencies of Liu. Accordingly, Applicant respectfully submits that claims 2 and 16 are patentable over the cited references for at least the foregoing reasons.

In view of the remarks set forth above, this application is in condition for allowance which action is respectfully requested. However, if for any reason the Examiner should consider this application not to be in condition for allowance, the Examiner is respectfully requested to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

Any fee due with this paper may be charged to Deposit Account No. 50-1290.

Respectfully submitted,

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